

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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DEBORAH DONOGHUE and
MARK RUBENSTEIN

Plaintiffs,

**JOINT STIPULATION AND
[PROPOSED] ORDER**

v.

MYOVANT SCIENCES LTD.,

No. 20-cv-01807-JGK

Nominal Defendant,

and

ROIVANT SCIENCES LTD.,

Defendant.

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WHEREAS, Plaintiffs commenced this action by filing a complaint dated February 29, 2020 (the “Complaint”) in the United States District Court for the Southern District of New York;

WHEREAS, Plaintiffs contend that they have properly effected service and Defendant Roivant Sciences Ltd. (“Defendant”) contends they have not;

WHEREAS, Plaintiffs have not served Defendant with a waiver of service form; and

WHEREAS, Plaintiffs and Defendant wish to agree to a reasonable schedule for answering the Complaint or briefing any motion to dismiss;

IT IS HEREBY STIPULATED AND AGREED among the undersigned parties, subject to the Court’s approval, as follows:

1. Plaintiffs shall be deemed to have sent a notice and request for waiver of service as of the date that this Stipulation is ordered by the Court pursuant to Rule 4(d) of the Federal Rules of Civil Procedure.
2. Defendant shall be deemed to have responded to the request and waived service as of the date that this Stipulation is ordered by the Court and, in accordance with paragraph (1), shall answer or move to dismiss the Complaint within sixty (60) days of this Stipulation being entered by the Court.
3. If Defendant moves to dismiss the Complaint, Plaintiffs shall file any opposition to Defendant's motion within sixty (60) days of Defendant's filing of its motion to dismiss.
4. If Plaintiffs file an opposition to Defendant's motion to dismiss, Defendants shall file any reply memorandum within thirty (30) days of Plaintiffs' opposition.

IT IS SO ORDERED.

THE HON. JOHN G. KOELTL
UNITED STATES DISTRICT JUDGE

Dated: March _____, 2020
New York, New York

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CERTIFICATE OF SERVICE

I hereby certify that on March 17, 2020, I electronically filed the foregoing Joint Stipulation and [Proposed] Order with the Clerk of the Court using the CM/ECF system, which sent notification of such filing to all attorneys of record.

Respectfully submitted,

/s/ John S. Williams
John Williams